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March 8, 2021

Via ECF

The Honorable Roanne L. Mann
Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: Yelena Ruderman v. Law Office of Yuriy Prakhin, P.C., et al.
E.D.N.Y. Case No. 19-cv-02987 (RJD) (RLM)**

Dear Magistrate Judge Mann:

As Your Honor is aware, this firm represents Defendants, Law Office of Yuriy Prakhin (the "Firm") and Yuriy Prakhin, Esq. ("Mr. Prakhin") (collectively, "Defendants"), in the above-referenced action. We write on behalf of both parties to provide the Court with a status report regarding the search and production of IM messages.

Alexander Pusachev, IT Service Specialist, IT Solutions Plus, Inc., was hired by Defendants to obtain and search the Firm's IM messages. IM messages are maintained in TXT format on the hard drive of each custodian's computer. IM messages are not maintained in any other format or location. In May 2020, Mr. Pusachev retrieved all available messages from the hard drives of the Firm's computers for the time period identified in the ESI Protocol, February 2018 through May 2020. Mr. Pusachev then provided all messages to Defendants and their counsel in TXT format and in paper copy.

After receiving the messages from Mr. Pusachev, Defendants' counsel converted the messages from TXT to PDF format and reviewed the messages only for relevance and privilege. All relevant, non-privileged messages were produced to Plaintiff in July 2020. Defendants have identified to Plaintiff from which account all messages were generated, including Yuriy Prakhin, Erica Larssen, Irene Raskin, Lilit Avetisyan, Patricia Belous, and Yelena Ruderman. Defendants further informed Plaintiff that there are no relevant, responsive messages to produce from the accounts of Sandra Beron or Gil Zohar. Finally, as stated in his affidavit, Mr. Pusachev was unable to retrieve any messages from the accounts of Irene Gabo and Stephen Ravis since their IM profiles ceased to exist because they were no longer employed with the Firm.

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Given that all relevant messages from the required custodians have been produced and Plaintiff has been informed which messages were generated from which custodian, the parties agree that this matter has been resolved. Thank you for Your Honor's consideration of this matter.

Respectfully submitted,

/s/ MED

Mary Ellen Donnelly
Nicole E. Price

cc: Counsel of Record (via ECF)